

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
CHATTANOOGA DIVISION

STACY STROBL and BRIAN HARDING,
On behalf of themselves and all others
Similarly situated,

Plaintiffs,

v.

PAUL CROFT; JONATHAN FROST;
RHINO ONWARD INTERNATIONAL, LLC;
ROI FUND I, LLC; ROI FUND II, LLC;
ROI FUND III, LLC; ROI FUND IV, LLC;
BRIAN KAWAMURA; CROFT & FROST,
PLLC; THE WELL FUND LLC; SCORPIO
REF, LLC; MATTHEW DIRA; THE DIRA
GROUP; CHESTNUT HOLDINGS, LLC;
STEVEN FROST; LISA FROST; JOSEPH
INVESTMENTS, LLC; JANE and JOHN
DOES 1-25,

Defendants.

Case No. 1:24-cv-00140-CLC-CHS

JURY DEMAND

**STIPULATION FOR INITIAL EXTENSION OF TIME TO RESPOND TO
COMPLAINT FOR DEFENDANTS THE DIRA GROUP AND MATTHEW DIRA**

Pursuant to Local Rule 12.1(a), Plaintiffs, Stacy Strobl and Brian Harding, and Defendants The Dira Group and Matthew Dira (“Dira Defendants”) hereby stipulate that the Dira Defendants’ time to file a responsive pleading in this action pursuant to Rule 12 shall be extended for twenty-one (21) days. The current deadline is May 1, 2024, so the extension shall make Defendant’s responsive pleading due May 24, 2024.

Respectfully submitted,

/s/ Benjamin A. Gastel (signed with permission)

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CERTIFICATE OF SERVICE

I hereby certify that on this the 25th day of April, 2024, the foregoing was filed electronically with the Clerk of Court to be served by operations of the Court's electronic filing system upon the following:

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